## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of

THE COMMONWEALTH OF PUERTO RICO, et al., Debtors<sup>1</sup> PROMESA TITLE III Case No. 17-BK-3283

(LTS)

RE: ECF No.

## MOTION FOR LEAVE TO AMEND PROOF OF CLAIM KNOLL NUMBER 32127

## To the Honorable United States District Court Judge Laura Taylor Swain:

COME NOW, Rivera Garcia, Myrna a plaintiff in the group creditors in the litigation captioned Nilda Agosto Maldonado et als v Family Department, ARV and AIJ, Case No. K PE 2005-0608, (the "Movant's"), by and through the undersigned attorney, to respectfully state, and request:

1. On June 20, 2018, Appearing Movant filed proof of claim number 32127 [now Kroll Restructuring Administration] based on the judgment of the Court of First Instance of Puerto Rico, Superior Section of San Juan, (the "Court of First Instance") in

<sup>&</sup>lt;sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

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the case styled, Nilda Agosto Maldonado et.als.vs.Commonwealth of Puerto Rico Family

Department, et. als., Case No. K PE 2005-0608, for the amount of \$\$9,111.90.

2. That the Proof of Claim was filed inadvertently under the name of Rivera

Garcia, Minerva, when the correct plaintiff's name is Rivera Garcia, Myrna.

3. To supplement and provide supporting documentation to this Motion, is

included as Exhibit No.1 the English translations of the judgment of reference and in order

to seek leave to amend the original proof of claim number 32127, for the sole purpose of

correcting the name of the plaintiff's – creditor.

WHEREFORE, it is respectfully requested that the Court grants Movants leave to

amend its proof of claim Kroll number 32127 to correct the name of the claimant.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY: that on this date, in accordance with Fed. R. Bankr. P. 9014(b),

Fed. R. Bankr. P. 7004(b), we electronically filed the foregoing with the Clerk of the Court

using the CM/ECF System, which will send notification of such filing to counsels of record.

Dated: October 17, 2022, in San Juan, Puerto Rico,.

ATTORNEY FOR GROUP CREDITORS

By: ISI IVONNE GONZALEZ-MORALES

**IVONNE GONZALEZ-MORALES** 

USDC NUM: 202701 PO BOX 9021828

SAN JUAN, PR 00902-1828

Tel. (787) 410-0119

E-mail: ivonnegm@prw.net

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